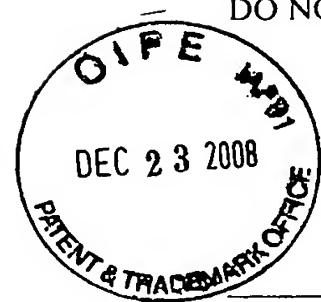


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Attorney Docket No. 8733.059.21
(PATENT REEXAMINATION)



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of:

Hee Young YUN, et al.

Customer No. 30827

Application No. 10/068,847

Confirmation No. 9705

Filed: February 11, 2002

Art Unit: 2871

For: COMPUTER HAVING LIQUID CRYSTAL
DISPLAY

Examiner: James A. Dudek

Mail Stop RCE

Commissioner for Patents

United States Patent and Trademark Office

P.O. Box 1450

Alexandria, VA 22313-1450

**PETITION UNDER 37 C.F.R. § 1.59(b) TO EXPUNGE PAPERS FILED IN
SECOND INFORMATION DISCLOSURE STATEMENT ON DECEMBER 22,
2008 BY, OR ON BEHALF OF HEE YOUNG YUN, ET AL.**

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

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Applicants state that the following documents, filed in the above-identified application contain references, pleadings, reports and/or various documents associated with a related litigation matter pending in LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002) and LG.Philips Co., Ltd. v. Michele B. Bovio et al., CV 04-11076-RCL, U.S. Dist. (Mass. 2004). Each of the submitted documents are subject to

a protective order and the information has not been otherwise made public. The documents to be expunged are listed on Exhibit A.

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Respectfully submitted,

Dated: December 23, 2008

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EXHIBIT A

UNDER SEAL - "Expert Report of Robert Smith-Gillespie on Liquid Crystal Displays"; LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), undated (16 pgs.)

UNDER SEAL - Joint Claim Construction Statement -- Exhibit A (Agreed Construction); U.S. Patent No. 6,373,537; U.S. Patent No. 6,020,942; U.S. Patent No. 6,002,457; and U.S. Patent No. 5,926,237 (not dated) (5 pgs.)

UNDER SEAL - Joint Claim Construction Statement -- EXHIBIT B (Disputed Construction), U.S. Patent No. 6,373,537; U.S. Patent No. 6,020,942; U.S. Patent No. 6,002,457; and U.S. Patent No. 5,926,237 (48 pgs.)

UNDER SEAL - Corrected [Proposed] Separate Statement of Uncontroverted Facts and Conclusions of Law in Support of Motion of Defendants Tatung Co. and Tatung Co. of America for Summary Judgment, or in the alternative, for Partial Summary Judgment of Invalidity of '457 and '237 Patents; LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002) (28 pgs.)

UNDER SEAL - Corrected Memorandum of Points and Authorities in Support of Motion of Defendants Tatung Co. and Tatung Co. of America for Summary Judgment, or in the alternative, for Partial Summary Judgment of Invalidity of '457 and '237 Patents; LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Nov. 15, 2005, including Cert. of Service (26 pgs.)

UNDER SEAL- LG.Philips LCD Co., Ltd's Memorandum of Points and Authorities in Support of Motion for Partial Summary Judgment of Infringement of USP Nos. '237, 457, and '537 (Side-Mount Patents), LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002) dated Nov. 15, 2005 (30 pgs.)

UNDER SEAL - Declaration of David M. Morris in Support of Opposition to Defendant's Motion for Summary Judgment of Invalidity for the Side Mount Patents for Anticipation; LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Dec. 1, 2005 (3 pgs.).

UNDER SEAL - LG.Philips LCD Co., Ltd's Memorandum of Points & Authorities in Opposition to Defendants' Opposition to Defendants' Motion for Summary Judgment of Invalidity for the Side-Mount Patents for Anticipation; LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Dec. 2, 2005 (15 pgs.)

UNDER SEAL - Statement of Genuine Issues, in Opposition to Defendants' Motion for Summary Judgment of Invalidity for the Side-Mount Patents for Anticipation, LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Nov. 15, 2005, dated Dec. 2, 2005 (35 pgs.)

UNDER SEAL - Declaration of E. Nair Flores in Support of Motion of Defendants Tatung Co. and Tatung Co. of America for Summary Judgment, or in the Alternative, for Partial Summary Judgment of Invalidity of USP '457 & '237; LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Nov. 14, 2005,

including Exhs. 1 & (10 pgs.).
UNDER SEAL - Declaration of Mark H. Krietzman in Support of Motion of Defendants Tatung Co. and Tatung Co. of America for Summary Judgment, or in the Alternative, for Partial Summary Judgment of Invalidity of USP '457 & '237; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), including Exhs. A-C & Cert. of Service (90 pgs.).
UNDER SEAL - Deposition of Yong-Bum KIM, including Exhs. , taken on April 7, 2005, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002) .
UNDER SEAL - Deposition of Robert Frame, including Exhs; taken July 28, 2005, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002)
UNDER SEAL - Deposition of Yong-Un BANG, including Exhs; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), taken April 12, 2005
UNDER SEAL -Deposition of Michele Bovio taken Oct. 14, 2005; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx)
UNDER SEAL -Deposition of Michele Bovio, taken Oct. 13, 2005; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), CV 02-6775 CBM (JTLx)
UNDER SEAL -Deposition of Michele Bovio; taken Oct. 10, 2005, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002)
UNDER SEAL -Reporter's Transcript of Trial Proceedings Defense's Witness, Cross Redirect of G. Lucovsky and videotape of examination of D. Castleberry; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), dated Nov. 3, 2006 (pp. 2207-2321).
UNDER SEAL - Memorandum of Contentions of Fact and Law of LG.Philips LCD Co., Ltd. and LG. Electronics Inc.; Motions In Limine, Attached, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated August 28, 2006 (116 pgs.)
UNDER SEAL - Defendants Tatung Company's and Tatung Co. of America's Motion in Limine to Preclude Plaintiff LG.Philips LCD Co., Ltd. from Arguing or Introducing Evidence to Suggest that it Invented the Admitted Prior Art Elements; Memorandum of Points and Authorities, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Aug. 28, 2006 (10 pgs.)
UNDER SEAL - Counterclaimant Chunghwa Picture Tubes, Ltd.'s Objections and Responses to Counterclaim Defendant' LG.Philips LCD Co., Ltd.'s Second Set of Interrogatories (Nos. 9-11), including Verification; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Aug. 8, 2005 (27 pgs.)
UNDER SEAL - Chunghwa Picture Tubes, Ltd.'s Supplemental Responses to LG.Philips

LCD Co., Ltd.'s First Set of Interrogatories (Nos. 1 & 3); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated May 10, 2006, including Cert. of Service (134 pgs.)
UNDER SEAL - Chunghwa Picture Tubes, Ltd.'s Supplemental Responses to LG.Philips LCD Co., Ltd.'s First Set of Interrogatories (Nos. 2, 5, 6, 8 & 9); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated May 26, 2006, including Cert. of Service (134 pgs.)
UNDER SEAL - Chunghwa Picture Tubes, Ltd.'s Sixth Set of Requests for Production of Documents and Things to LG.Philips LCD Co., Ltd. (Nos. 153-206), <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Feb. 16, 2005, including Cert. of Service (18 pgs.)
UNDER SEAL - Chunghwa Picture Tubes, Ltd.'s Objections and Third Supplemental Response to LG.Philips LCD Co. Ltd's First Set of Interrogatories (No. 5), <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated May 27, 2005, including Cert. of Service (174 pgs.)
UNDER SEAL - Chunghwa Picture Tubes, Ltd.'s Objections and Fourth Supplemental Response to LG.Philips LCD Co. Ltd's First Set of Interrogatories (No. 5), <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated August 5, 2005, including Cert. of Service (189 pgs.)
UNDER SEAL - Plaintiff Chunghwa Picture Tubes, Ltd.'s First Corrected Supplemental Objections and Responses to Defendant LG.Philips LCD Co. Ltd's First Set of Interrogatories (No. 2-20), Chunghwa Picture Tubes, Ltd. v. LG Electronics Inc. et al., CV -05-0189 CBM (JTL) dated June 9, 2006 (28 pgs.)
UNDER SEAL - Defendant Viewsonic Corporation's Objections and Responses to LG.Philips LCD Co., Ltd.'s First Set of Interrogatories (Nos. 1-8); LG.Philips LCD Co., Ltd. v. Viewsonic Corp.; Case No. CV-03-2886 CBM (JTLx); dated Jan. 5, 2004 (19 pgs.).
UNDER SEAL -Defendant Tatung Company of America's First Set of Supplemental Responses to Plaintiff LG.Philips LCD Co., Ltd.'s Interrogatory No. 8; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Nov. 9,2005 (7 pgs.)
UNDER SEAL - Defendant Tatung Company of America's Second Set of Supplemental Responses to Plaintiff LG.Philips LCD Co., Ltd.'s Interrogatory No. 8; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated May 30, 2006 (9 pgs.)
UNDER SEAL - Deposition of D. Grundstrom, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated October 28, 2005 (15 pgs.)
UNDER SEAL -Deposition of V. Gupta, <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Oct. 26, 2005 (203 pgs.)
UNDER SEAL - UNDER SEAL -Deposition of V. Gupta, <u>LG.Philips LCD Co., Ltd. v.</u>

Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Aug. 7, 2005 (203 pgs.)
UNDER SEAL - CHUNGHWA PICTURE Tubes, Ltd.'s Sixth Set of Requests for Production of Documents and Things to LG.Philips LCD Co., Ltd. (Nos. 153-206); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated Feb. 16, 2005 (18 pgs.)
UNDER SEAL - LG Electronics Inc.'s Responses to CPT's Second Set of Interrogatories (Nos. 7-11); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated April 7, 2005, including Cert. of Service (13 pgs.).
UNDER SEAL - Plaintiff LG. Philips LCD Co., Ltd.'s Supplemental Responses to Defendant Chunghwa Picture Tubes, Ltd.'s First Set of Interrogatories to LG.Philips LCD. Co., Ltd. (Interrogatories Nos. 1-2); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated May 30, 2006, (106 pgs.).
UNDER SEAL -Plaintiff LG.Philips LCD Co., Ltd.'s Supplemental Responses to Defendant Chunghwa Picture Tubes, Ltd.'s Interrogatory Nos. 13-14; <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated May 30, 2006 (4 pgs.)
UNDER SEAL - - Plaintiff LG.Philips LCD Co., Ltd.'s Supplemental Response to Defendant Chunghwa Picture Tubes, Ltd.'s Interrogatory (Nos. 1-3); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated June 23, 2003 (4 pgs.)
UNDER SEAL - Plaintiff LG.Philips LCD Co., Ltd.'s Supplemental Responses to Defendant Chunghwa Picture Tubes, Ltd.'s First Set of Interrogatories (No. 2); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002), dated July 30, 2004(4 pgs.)
UNDER SEAL -LG Electronics' Objections and Responses to Defendant Chunghwa Picture Tube Ltd.'s Third Set of Interrogatories (Nos. 12-24) (Erroneously Captioned as Nos. 12-18); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated Aug. 8, 2005 (13 pgs.).
UNDER SEAL - Plaintiff LG.Philips LCD Co., Ltd.'s Supplemental Responses to Defendant Chunghwa Picture Tubes, Ltd.'s First Set of Interrogatories (Nos. 2-3); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated Aug. 21, 2003 (8 pgs.)
UNDER SEAL - LG.Philips LCD Co., Ltd.'s Objections and Responses to Defendant Chunghwa Picture Tubes, Ltd.'s Seventh Set of Interrogatories (Nos. 21-25) (Erroneously Captioned as Nos. 21-23); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated Sept. 16, 2005 ((10 pgs.)
UNDER SEAL - Plaintiff LG.Philips LCD Co., Ltd.'s Responses to Defendant Chunghwa Picture Tubes, Ltd.'s Fifth Set of Interrogatories (Nos. 13-17); <u>LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al.</u> , CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); dated Nov. 17, 2004 (10 pgs.)

UNDER SEAL - Plaintiff LG.Philips LCD Co., Ltd.'s Supplemental Responses to Defendant Chunghwa Picture Tubes, Ltd.'s Interrogatories Nos. 13-14 and 17); LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002) dated March 7, 2005 (7 pgs.)

UNDER SEAL - LG.Philips LCD Co., Ltd.'s Supplemental Responses to CPT's First Set of Interrogatories Nos. 1, 2 3 and 4); LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002); Oct. 20, 2003, CV 02-675 CBM (JTLx) (43 pgs.)

UNDER SEAL - Order Re Claim Construction, LG.Philips LCD Co., Ltd. v. Tatung Company of America, et al., CV 02-6775 CBM (JTLx), U.S. Dist. (C.Cal. 2002) dated May 5, 2005 (19 pgs.)

UNDER SEAL -Table comparing elements of '139 & '457 patents to JP 1-237591, JP U1-59223, JP U3-6670, JP 7-99394 (9 pgs.)

UNDER SEAL -Table comparing elements of '537 patents to JP 05-42853, JP Publn. 7-99394, JP 04-56822 (6 pgs.)

UNDER SEAL -Letter to David Makman, Esq. from Tom Simotas, re: 50 133 T 00379 04; Chunghwa Picture Tubes, Ltd. ("CPT") v. LG Electronics Inc. et al., June 20, 2006 (22 pgs.)

UNDER SEAL -Assignment Agreement between Hewlett-Packard Development Co, LP and Chunghwa Picture Tubes, Ltd. dated Feb. 10, 2004 (17 pgs.)

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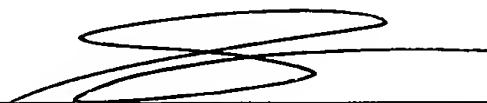
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Respectfully submitted,

Dated: December 23, 2008

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EXHIBIT A

LCD Business Headquarter Patent Management Part; History of LG Side Mounting Patent Invention; MLA 005099; 1 pg.
Mead SPELL-WRITE STENO BOOK; LPL Ref No. 020717 w/Appendix A-C
Correspondence: FOSTER, Mark Re: Project X Status; LPL Ref No. 021059; dated 14 Feb. 1996; 2 pgs
Foreign Correspondence w/Translation; HWANG, Un-Kwang; Report on the Tokyo Meeting of Company Q; dated 28 Mar. 1996; 6 pgs.
Foreign Correspondence w/Translation; Report on Meeting with Company Q; LPL Ref Nos. 021136-021140; dated 22 Feb. 1996; 10 pgs.
Foreign Correspondence w/Translation; Comments on Request of 13.3" XGA Review (including request 14.1" development review); LPL Ref No. 22423; 13 Aug. 1996; 2 pgs.
Foreign Correspondence w/Translation; Report on Meeting with Company Q; LPL Refs Nos. 019632-019634; dated 29 Feb. 1996; 6 pgs.
Foreign Correspondence w/Translation; Report on Tool-Related Meeting with Company Q; LPL Refs Nos. 019635-019644; dated 27 Feb. 1996; 6 pgs.
Foreign Correspondence w/Translation; Report on Meeting with Company Q; LPL Refs Nos. 019645-019647; dated 11 Feb. 1996; 6 pgs.
Facsimile Correspondence; FOSTER, Mark; Re: Project X Status; LPL Refs Nos. 019665-019667; dated 14 Feb. 1996; 3 pgs.
English Translated Travel Itinerary Re: March 26 Business Trip to Tokyo; LPL Refs Nos. 019845-019846; 2 pgs.
English Translated Meeting Slides; Executive Meeting with Digital Re: Project X; LPL Ref Nos. 019847-019856; dated 26 Mar. 1996; 20 pgs.
English Translated Memo; KIM, Sung Kyu; Report on Business Trip to Company Q; LPL Ref Nos. 019883-019885; 11 Mar. 1996; 6 pgs.
Facsimile Correspondence w/Translation; Re: Business Trip Interim Report; LPL Ref Nos. 019894-019898; dated 6 Mar. 1996; 9 pgs.
English Translated of 8 Mar. 1996 Discussion Report; LPL Ref Nos. 019899-019903; dated 12 Mar. 1996; 14 pgs.
English Translated Inquiry on Content of Document dated 9 May 1996 CHO, Ki Ho; LPL Ref Nos. 020007- 020008; dated 7 May 1996; 4 pgs.
MAI, Mike; Email Correspondence Re: Project X Executive Review Meeting Minute; LPL Ref Nos. 020018-020020; 4 June 1996; 3 pgs
LEE, Dave; Letter to BOVIO Re: An Update to 14.1: XGA Display for Project X; LPL Ref Nos. 019505-019507
English Translation; Re: Minutes of Q Company's Tokyo Meeting dated 28 Mar. 1996 - Resent; LPL Ref No. 0195112-019513; 6 pgs.
English Translation; Re: Q's Visit / Minutes; LPL Ref Nos. 019520-019522; dated 30 Mar. 1996; 6 pgs
Translated Facsimile; Report of the Meeting with Q; LPL Ref Nos. 019523-019526; dated 22 Feb. 1996;

LEE, Soo Gwan; Translated Memo Re: Consulting with Q; LPL Ref Nos.:
019527-019530; dated 22 Feb. 1996; 8 pgs

English Translated Document Re: Comments on Requesting to Review 13.3”
XGA (Request of Review on 14.1” XGA Development Included); LPL Ref
No. 019630; 15 Feb. 1996; 2 pgs.